

**Government Relations**

MAC N9305-171  
Wells Fargo Center  
Sixth and Marquette  
Minneapolis, MN 55479  
612-667-9406  
612 667-9403 Fax

5051  
**WELLS  
FARGO**

April 24, 2002

Mr. Jeff S. Jordan  
Supervisory Attorney  
Federal Elections Commission  
Washington, DC 20463

Re: MUR 5251

Dear Mr. Jordan:

The FEC letter relating to the FEC matter numbered MUR 5251 recently came to my attention. As a Vice President for Government Relations at Wells Fargo & Company I am responding for our Corporation.

A senior manager in Colorado responded to a solicitation by Lieutenant Governor Joe Rogers for an April 2000 Lieutenant Governor's Conference on Youth Education. This request is similar to numerous requests and solicitations Wells Fargo receives in our businesses and locations across the nation. When the solicitor, in this instance Lt. Gov. Rogers, is known and has standing and reputation in the community we frequently respond in a positive way to the request.

In this instance, a Wells Fargo manager believed the Lt. Governor that the contribution was solely to conduct the Youth Education Conference. Our manager had no way of knowing that any of the contribution would be used in any other way; and the manager was not involved otherwise with the Youth Conference.

Because our intent was clearly to support the Youth Conference; because Wells Fargo had no engagement or participation in the Youth Conference itself; and because Wells Fargo was not involved in any of Lt. Governor Rogers campaign activities, or in his use of campaign funds, it is clear to me that Wells Fargo is not involved in any way with the complaint filed except as an innocent contributor to a Youth Conference.

Wells Fargo does not need to be represented by Legal Counsel on this matter - MUR 5251. If you wish to discuss this matter, or to follow up on this letter, please contact me directly at 612/667-6891.

Sincerely,

*Bill Kelly*

Bill Kelly  
Vice President Government Relations

cc: Stan Stroup, Diane Lilly, Tom Honig

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COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
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